



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

May 1, 2007

Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division
Building 1442
9430 Jackson Loop
Fort Belvoir, Virginia 22060

Re: Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia (CEQ# 20070071)

Dear Mr. McLaughlin:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia. As a result of this review, EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information.

The BRAC realignment at Fort Belvoir involves two important considerations. First, the post's current master plan does not encompass the Environmental Proving Ground (EPG) because of past intentions to dispose of that 807-acre area for other development. Second, the proposed increase in personnel represents the largest relocation of personnel in the BRAC 2005 round. Approximately 7 million square feet of new and renovated facilities and approximately 7 million square feet of parking must be ready for use by September 15, 2011. Thus, the DEIS serves the dual purpose of evaluating the potential environmental impacts of two proposals at Fort Belvoir—the update of the land use plan of the post's real property master plan (RPMP) and implementation of the base realignment.

The Department of the Army (Army) considers the Preferred Alternative which emerged as a hybrid of three conceptual development strategies. The DEIS evaluates four land use plan alternatives and four alternatives for implementation of the BRAC realignment. EPA's comments focus on the Preferred Land Use Alternative/Preferred Alternative for BRAC



Implementation. Specific concerns pertain to eliminating the Environmentally Sensitive land use category and impacts to natural resources, vegetation, endangered/threatened/sensitive species, water resources, and soils.

Land Use Plan Update

The Preferred Alternative land use plan would aggregate land use categories in a way that reflects and supports the evolution in Fort Belvoir's mission. The proposed land use designations simplify and consolidate the existing 1983 land use categories into other broadly defined categories providing greater flexibility for future development without having to confront compatibility. These designations are Airfields, Community, Industrial, Residential, Training, Professional/Institutional, and Troup.

The Community category includes safety clearance, security areas, water areas, wetlands, conservation areas, resource protection areas (RPAs), forest stands, and former training areas. As stated on page 4-19, "At both EPG and South Post, new development and renovations would, with minor exception (e.g. minor wetlands), take into consideration areas currently identified for environmental preservation and conservation." Page 4-267 states that "Areas designated Outdoor Recreation or Environmentally Sensitive under the 1983 land use plan (except for the SNAs), if changed to Community, might remain as outdoor recreation areas or environmentally protected buffer areas but could be used for purposes less protective of natural vegetation." Page 4-268 also states that land redesignated as Range/Training could be less protective of natural vegetation than a specific Environmentally Sensitive land use designation. In addition, land use designations of Professional/Institutional or Residential support development which could have adverse consequences on vegetation in an environmental sensitive area.

Since the Environmental Sensitive land use category from the 1983 plan would not be carried forth to the revised land use plan, there is concern that this change runs the risk of undermining environmentally sensitive areas that are not necessarily labeled a "high-value resource" but are nonetheless environmentally sensitive. The fear is that the revised land use plan will not allow for sound use of physical and natural resources at the post with respect to future land use requirements. This land use change can only secure protection to the three Special Needs Areas: the Jackson Miles Abbott Wetland Refuge (JMBWR), Accotink Bay Wildlife Refuge (ABWR), and the Forest and Wildlife Corridor. Therefore, environmentally sensitive areas are not protected by the proposed land use plan.

Natural Resources

Page 4-271 states that "Approximate acreages of natural resources that could be directly affected under the proposed action are 21 acres of the Environmental Quality Corridor (EQC), 2 acres of wetlands, 6 acres of riparian buffers, and 14 acres of RPAs.

The FEIS should identify the location of the proposed projects and the natural resources that they impact. The specific resource impacted should be identified. A map depicting the proposed projects in relation to the impacted natural resources should also be provided. The



impacted wetlands should be identified and the functional value provided. Impacts to wetlands should be avoided or minimized whenever possible. The FEIS should also discuss how the impact to these natural resources will affect the water resources in the impacted areas.

Section 4.8.1.3 identifies Rare Plant Communities that are either very rare or extremely rare ecological communities that exist on Fort Belvoir's Main Post. The FEIS should discuss the potential impacts (if any) to these communities and specify the size of these ecological communities.

One area mentioned in this section is a tidal hardwood swamp. It is important to note that forested wetland systems act as natural filters and sediment traps and absorb flood waters. They provide vital ecological functions that are critical to several wetland dependent animal and plant species. This type of wetland system is vulnerable to a variety of human practices, such as agriculture, urbanization, and forestry. Therefore, wetland impacts from human activities should be avoided to the maximum extent practicable and be properly protected. EPA's mandates include the preservation of these environmentally significant resources.

Vegetation

The DEIS states that the large amount of development associated with the Preferred Alternative would require the conversion of much vegetated areas on the Main Post and EPG to developed areas. Development would have long-term moderate adverse effects because it could increase habitat fragmentation and reduce habitat connectivity, increase the occurrence of invasive species in fragmented habitats, and could reduce the overall ecological integrity of the installation's natural habitat. Table 4.8-4 lists the vegetative community types and the total approximate acres of projects proposed in the area of the post. However, it is not clear if the approximate acres of projects proposed in the area is equivalent to the approximate acreage of vegetative community impacted. The FEIS should specify where the forest removal is to take place in the designated area of the post, provide the acreage and kind of vegetative community impacted, and discuss if habitat loss has been accounted for with particular attention to impact on sensitive species.

Endangered, Threatened, and Sensitive Species

As stated on page 4-270, "A total of 179 acres of Partners in Flight (PIF) habitat, 8 acres of sensitive flora habitat, and 6 acres of sensitive fauna habitat would be lost under the alternative." Projects proposed on EPG could reduce the quantity of habitat for the following PIF species: field sparrow, prairie warbler, wood thrush, and worm-eating warbler. The small whorled pogonia has been found on the western portion of EPG and it is the only known location of the species in Fairfax County.

A project for the South Post, a family travel camp, is proposed for areas identified as occasional-use foraging areas for bald eagles. The family travel camp area is also an area where seeps of the type that support the northern Virginia well amphipod occur, and indirect impacts on that species could occur from development. Road improvement projects pass through wood turtle habitat.



The Endangered Species Act (ESA) provides for the listing of endangered and threatened species of plants and animals as well as the designation of critical habitat for listed species. The ESA prohibits the taking of any listed species without (for federal agencies) an “Incidental Take Statement.” The definition of “taking” includes injury and harassment. The ESA also requires federal agencies to exercise their authorities, in consultation with designated agencies (in effect, the U.S. Fish and Wildlife Service and National Marine Fisheries Services as appropriate), to conserve endangered species. It further requires federal agencies to consult with these agencies on any action that may jeopardize the continued existence of any threatened or endangered species, which has been interpreted by regulation to require consultation for any action that “may affect” such species. For actions that may adversely affect species, the regulatory agencies may recommend mitigation. Such mitigation is required if an agency action would otherwise jeopardize the species existence, and it may be required if agency action will result in a take and, therefore, require an incidental take authorization.

The FEIS should indicate where the impacted species are in relation to the proposed projects. The most recent state and federal threatened and endangered species coordination letters should be included in the FEIS.

Water Resources

As noted on page 4-190, “...the placement of fill in association with stream crossings could result in an increase in the topography in the vicinity of the Accotink Creek drainage and its tributaries.” The FEIS should discuss what impacts this change in topography may have on drainage (if any). It is requested that the number, size and use of the stream crossings proposed be provided. It is noted on page 4-193 that one new bridge over the Accotink Creek is proposed which would also result in direct impacts to soils associated with the construction of piers and footings. The FEIS should assess the potential impacts to the water quality of the stream and the potential impacts that could result from the stream crossings and bridge. Impacts to biological resources should also be noted. Page 4-191 states that, “Crossings of Accotink Creek ...could require drilling or small amounts of blasting to manipulate the bedrock features adjacent to the creek.” Potential impacts from this activity should be addressed in the FEIS.

Soils

Page 4-191 states, “Soil types that could support prime farmlands occur within the project area. However, since the lands within Fort Belvoir are in urban use or otherwise irreversibly committed to other uses, the prime farmland designation does not apply.” If there is any farmland in the study area, it should be evaluated and classified. Prime and unique farmland impacted by the project should be delineated regardless of the current state of cultivation. These efforts should be coordinated with the National Resources Conservation Service. Impacts to prime and unique farmland should be avoided. However, if this is not possible the FEIS should explain the implications of developing the prime and unique agricultural land with respect to the Farmland Protection Policy Act as well as describe the mitigation measures for those impacts.



Page 4-193 states that, "Infrastructure would also include installation of approximately 25,000 linear feet of perimeter fencing, which would require clearing and grubbing of an area approximately 40 feet wide throughout the length of the fence." The FEIS should specify what is being cleared, identifying soils and vegetation.

Energy Efficiency

This project presents an excellent opportunity to implement the President's Executive Order 13423: Strengthening Federal Environment, Energy and Transportation Management by incorporating energy efficiency into the renovation and construction efforts for this project. Enclosed with this letter is information that EPA recommends the Army consider when planning the renovation/construction phase of this project.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

/S/

William Arguto
NEPA Team Leader

Enclosures (2)

